



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SDD:SPN  
F.# 2015R00094

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 16, 2015

BY ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Tairod Nathan Webster Pugh  
Criminal Docket No. 15-00116

Dear Judge Garaufis:

The government respectfully submits this letter to advise the Court that, based on the representation of defense counsel, it expects the defendant in the above-referenced case to waive venue and proceed to trial in the Eastern District of New York on both counts of the indictment returned March 16, 2015. Accordingly, the government respectfully requests that the Court establish the defendant's waiver of venue on the record at the next status conference, scheduled for October 23, 2015 at 12:30 p.m.

In addition, the government notes that, based on its review of potentially discoverable classified materials in this case, and as discussed in greater detail in an ex parte submission to be filed simultaneously with this letter, the government anticipates that it will be able to fulfill its discovery obligations under Rule 16 of the Federal Rules of Criminal Procedure without reliance on the procedures set forth in Section 4 of the Classified

Information Procedures Act. See 18 U.S.C. App. 3 (“CIPA”). Accordingly, the government does not intend to file a motion under CIPA Section 4 on October 19, 2015, the filing date set by the Court.

Respectfully submitted,

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Acting United States Attorney

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cc: Eric Creizman, Esq. (by ECF)